

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
Professional Fee Matters Concerning the	§	
Jackson Walker Law Firm	§	Case No. 23-00645 (EVR)
	§	
	§	

**DECLARATION IN SUPPORT OF DAVID R. JONES' EMERGENCY
MOTION TO QUASH SUBPOENA**

I, David R. Jones, declare as follows:

1. I am a customer of the financial institution from which financial records pertaining to me have been sought, Bank of America, National Association.

2. My counsel was served by the United States Trustee (the "U.S. Trustee") with a Notice to Customer dated October 8, 2024 in connection with the U.S. Trustee's subpoena of my bank records issued on October 8, 2024 to Bank of America, National Association (the "Subpoena"). A true and correct copy of the Notice to Customer with the Subpoena is attached as **Exhibit 1**.

3. The Notice to Customer states that my bank records are sought for the following purpose: "the United States Trustee is pursuing professional employment and fee relief in an action against Jackson Walker LLP."

4. The Notice to Customer has not stated with reasonable specificity the relevance of 6.5 years of my personal bank records to the U.S. Trustee's investigation into Jackson Walker fee matters.


5. I am not a party to these proceedings. The U.S. Trustee filed motions seeking the disgorgement of Jackson Walker fees in multiple bankruptcy cases (the "Miscellaneous

Proceedings"). As stated by the parties, the Miscellaneous Proceedings concern what *Jackson Walker* did or did not know and what *Jackson Walker* did or did not do with respect to its disclosures *as limited to the affected cases*.

6. My bank records have no relevance in the determination of what Jackson Walker knew or did not know about my relationship with Elizabeth Freeman, and what Jackson Walker did or did not do with that knowledge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 15th day of October, 2024, at Houston, Texas.



David R. Jones